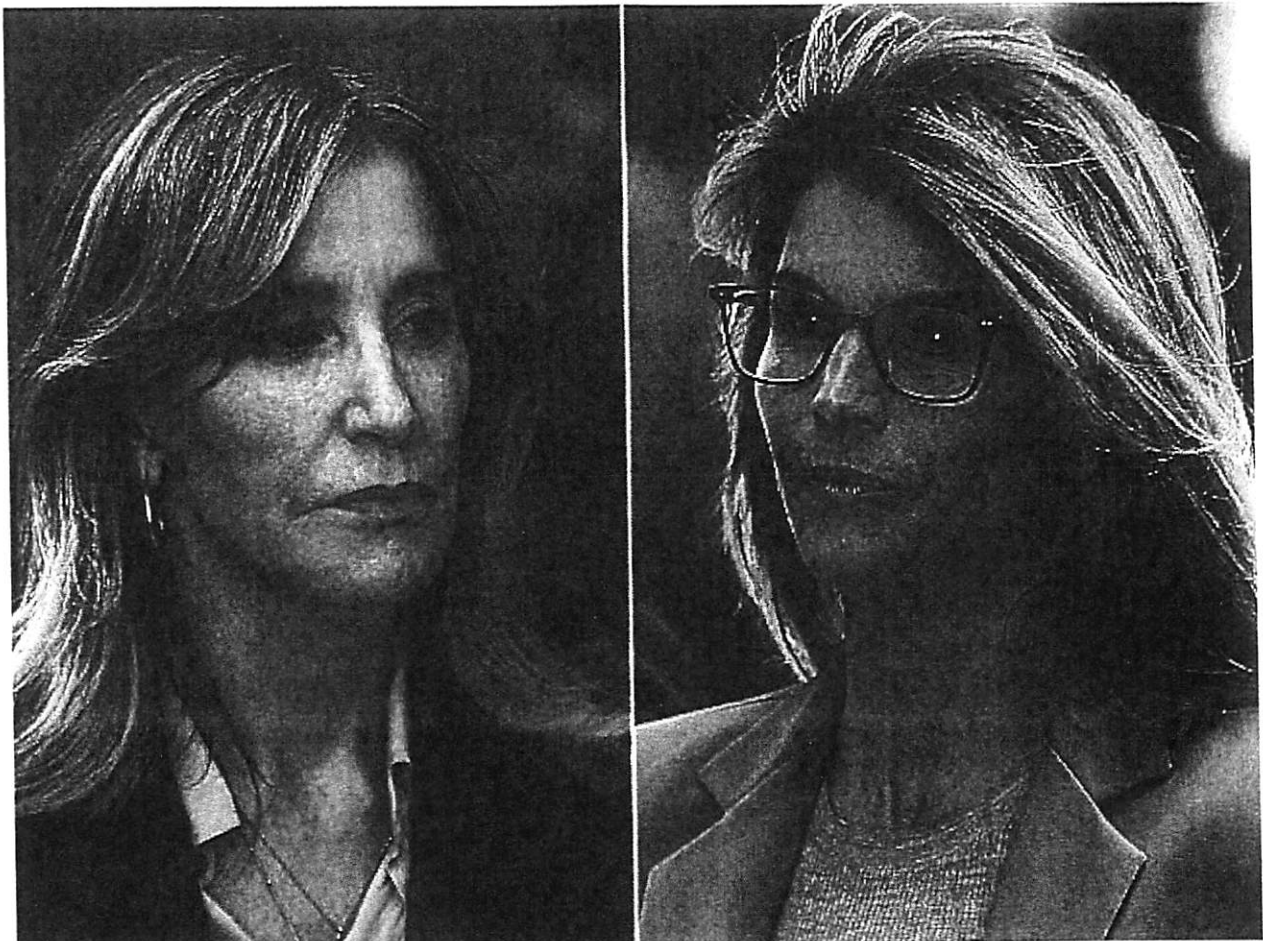



EXHIBIT No.

1

Report: Prosecutors 'Determined' to Jail Felicity Huffman and Lori Loughlin in College Bribery Case



AP Photo/Charles Krupa, left, Steven Senne
JOSHUA CAPLAN

4 Apr 2019 

2:19

Prosecutors are “determined” to see that Hollywood actresses Lori Loughlin and Felicity Huffman

receive jail time for their part in the elite college bribery case, according to a report.

Deadline reported Wednesday that jail time for the actresses appears “more and more likely.” Sources told the Tinseltown-focused website that law enforcement officials have signaled that Loughlin and Huffman could serve between six months and just under two years behind bars. However, their level of cooperation with the investigation will ultimately dictate the length of their sentences and fines, Deadline’s source added.

Breitbart TV



Loughlin, 54, who appeared in the 1980s and '90s sitcom *Full House*, is accused along with her fashion designer husband Mossimo Giannulli of paying \$500,000 to get their daughters admitted as recruits to the University of Southern California crew team, even though neither is a rower. Authorities said the couple helped create fake athletic profiles for their daughters by having them pose for photos on rowing machines.

The Hallmark Channel, where Loughlin starred in popular holiday movies and the series *When Calls the Heart*, cut ties with her a day after her arrest.

Huffman, the 56-year-old former *Desperate Housewives* star, is charged with paying the admissions consultant at the center of the scheme \$15,000 to have a proctor correct the answers on her daughter’s SAT.

The two actresses and Giannulli said little during the brief hearing in a packed Boston courtroom and were not asked to enter a plea. They remain free on bail. Several other parents were given similar hearings of a few minutes each.

The proceedings came three weeks after 50 people in all were charged with taking part in a scheme in which parents bribed coaches and helped rig test scores to get their children into some of the nation’s most selective universities, including Yale, Stanford, Georgetown and USC.

The case — the biggest college admissions scheme ever prosecuted by the U.S. Justice Department — has roiled the world of higher education and amplified complaints the system is stacked in favor of the rich.

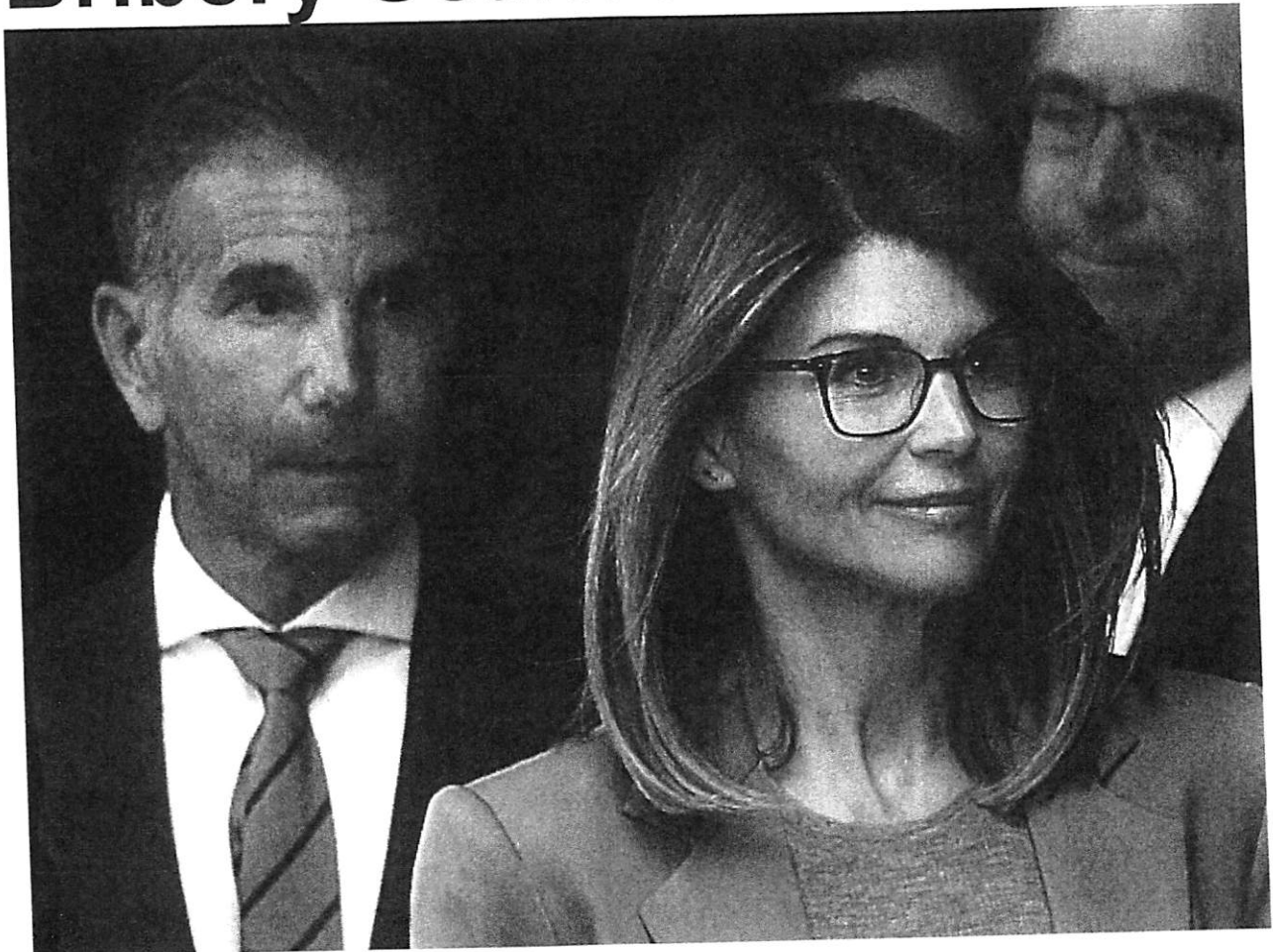
The Associated Press contributed to this report.

EXHIBIT No.

2

G - Parents

Lori Loughlin, Other Defendants Face Additional Charges in College Admissions Bribery Scandal



AP Photo/Steven Senne

23 Oct 2019

2:36

Actress Lori Loughlin and her husband, along with other defendants in the “Varsity Blues” college admissions bribery scandal, were hit with additional charges on Tuesday over their role in the scam.

According to a report by *People* magazine, former *Full House* actress Lori Loughlin is “terrified” of the new charges that were levied against her and her husband on Tuesday in the Varsity Blues college admissions scandal, which was uncovered by the DOJ earlier this year.

Loughlin and her husband have been accused of paying \$500,000 to have their two daughters fraudulently admitted to the USC as rowing recruits. Neither of the girls were competitive rowers prior to enrolling at the university.

Breitbart TV



Play Video

VIDEO

The Department of Justice claims that Loughlin and nine other defendants “conspired to commit federal program bribery by bribing employees of the University of Southern California (USC) to facilitate their children’s admission.” Both Loughlin and her husband, fashion designer Mossimo Giannulli, were charged on Tuesday with one count of conspiracy to commit federal programs bribery.

An anonymous source told *People* magazine that she is terrified over the prospect of spending time in prison. Now, according to the source, Loughlin fears an especially harsh sentence for her role in the bribery scandal due to the national media attention on the case.

“They feel like this is David versus Goliath. How do you go up against the federal government, when the government has decided to make an example out of you? How can you possibly move forward from this?” the anonymous source said.

“It just gets worse and worse for her. And you have to remember: nothing new has happened. They could have charged her with all of this last spring. But they waited,” the anonymous source added. “She feels like she is a scapegoat.”

Breitbart News reported in August that Loughlin had allegedly defended her role in the scam by arguing that she thought that all wealthy Americans bribe colleges in exchange for their children’s admission.

Breitbart News reported in September that actress Felicity Huffman had been sentenced to 14 days in prison for her role in the scam. Huffman had paid \$15,000 to a company that

provided her daughter with an SAT proctor that modified her answers, thus increasing her score, prior to submission of the exam. Huffman is ~~scheduled~~ for release on October 27.

Stay tuned to Breitbart News for more on the Varsity Blues college admissions scandal.

EXHIBIT No.

3

USC Fires Athletic Dept. Officials Tied to College Admissions Scandal

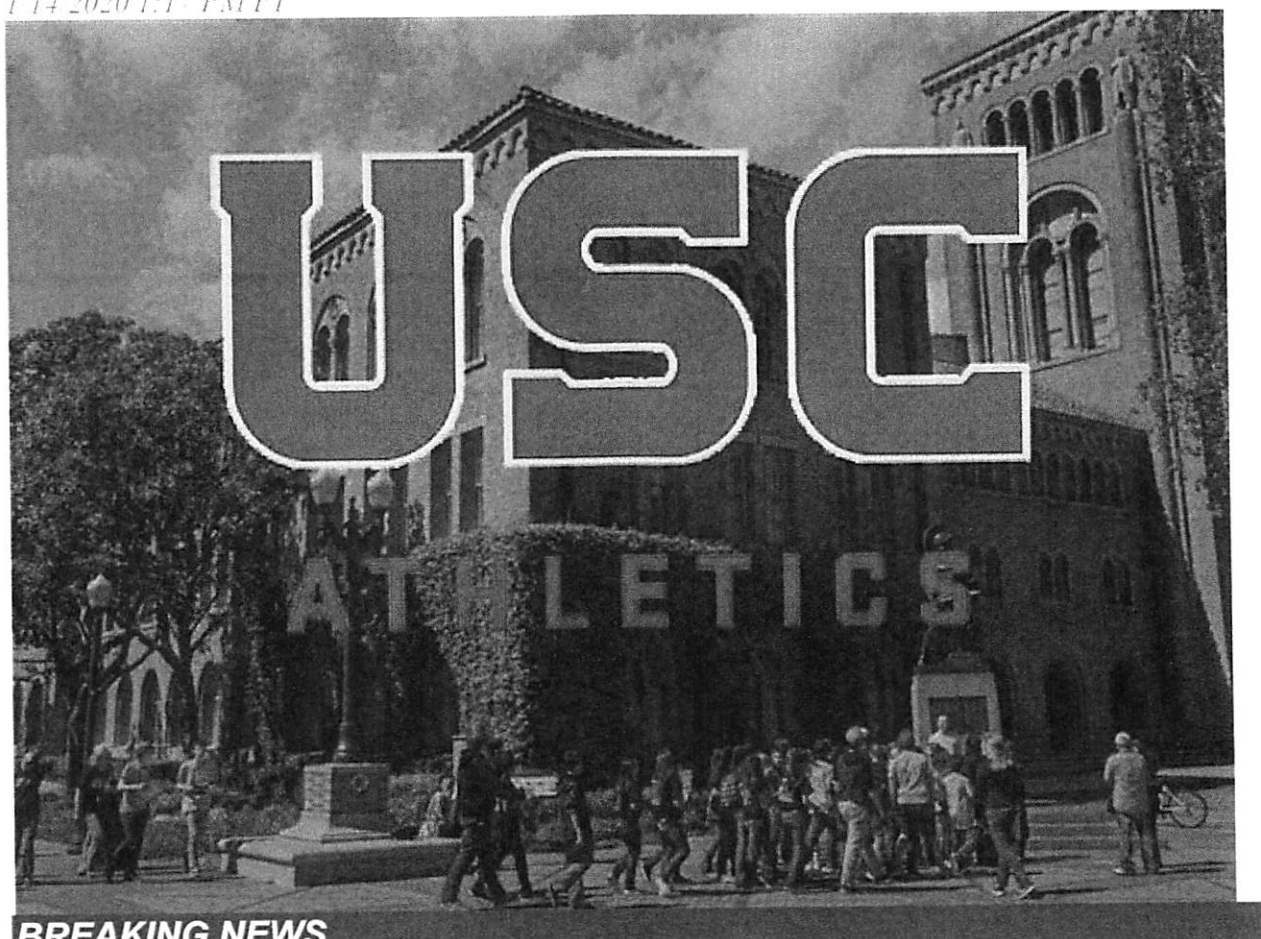
USC ATHLETICSTHREE OFFICIALS FIRED ...Tied to Admissions Scandal

• 468

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• 266

1/14/2020 1:17 PM PT



Getty

Heads are rolling in USC's athletic department over the college admissions scandal and university fundraising -- a key part of Lori Loughlin and Mossimo Giannulli's defense.

The university just fired 3 officials -- CFO **Steve Lopes**, senior associate athletic director **Ron Orr** and associate athletic director **Scott Jacobson**. USC hasn't said why they were canned, but we've confirmed all 3 were heavily involved in fundraising efforts for Trojan athletics.

TMZ broke the story ... Mossimo wrote a check for \$50k, payable directly to USC. Sources connected to the case told us the check was sent to another athletics director, **Donna Heinel**, who USC already fired. We're told the check was sent at the direction of the scandal ringleader, **Rick Singer**.

Lori and Mossimo contend they were making a donation on the up and up -- and for that reason, one of their key witnesses could be former Athletic Director **Pat Haden**. He talked about his fundraising mission back in 2011, saying the Trojans needed to keep donor checks coming in to "feed the beast."

Our sources say USC has been handing over documents to prosecutors and defense attorneys in the case -- so it's possible some of those docs turned up new incriminating info about the newly fired officials. We haven't been able to confirm that.

You'll recall, Singer requested photos of Loughlin and Giannulli's daughters, **Olivia Jade** and **Isabella**, on rowing machines. Prosecutors believe the intent was to make it seem they were avid rowers, eligible for admission as USC Crew team members.

We're told USC had its antennae up as much 9 months before the indictments of Singer, Loughlin, Giannulli and **Felicity Huffman**. In fact, Heinel was fired the same day the feds announced the indictments in March 2019.

Sounds like USC is cleaning house. The school's new Athletic Director, **Mike Bohn**, was announced in November ... after **Lynn Swann** resigned from the position in September.

EXHIBIT No.

4

USC statement regarding college admissions investigation

March 12, 2019

We are aware of the ongoing wide-ranging criminal investigation involving universities nationwide, including USC. USC has not been accused of any wrongdoing and will continue to cooperate fully with the government's investigation.

We understand that the government believes that illegal activity was carried out by individuals who went to great lengths to conceal their actions from the university. USC is conducting an internal investigation. Donna Heinel and Jovan Vavic have been terminated and the university will take additional employment actions as appropriate.

USC is in the process of identifying any funds received by the university in connection with this alleged scheme. Additionally, the university is reviewing its admissions processes broadly to ensure that such actions do not occur going forward.

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Updated at 1 p.m.

EXHIBIT No.

5

Prosecutors are sending 'target letters' to others linked to college admissions scam, an official tells CNN

By Mark Morales, CNN

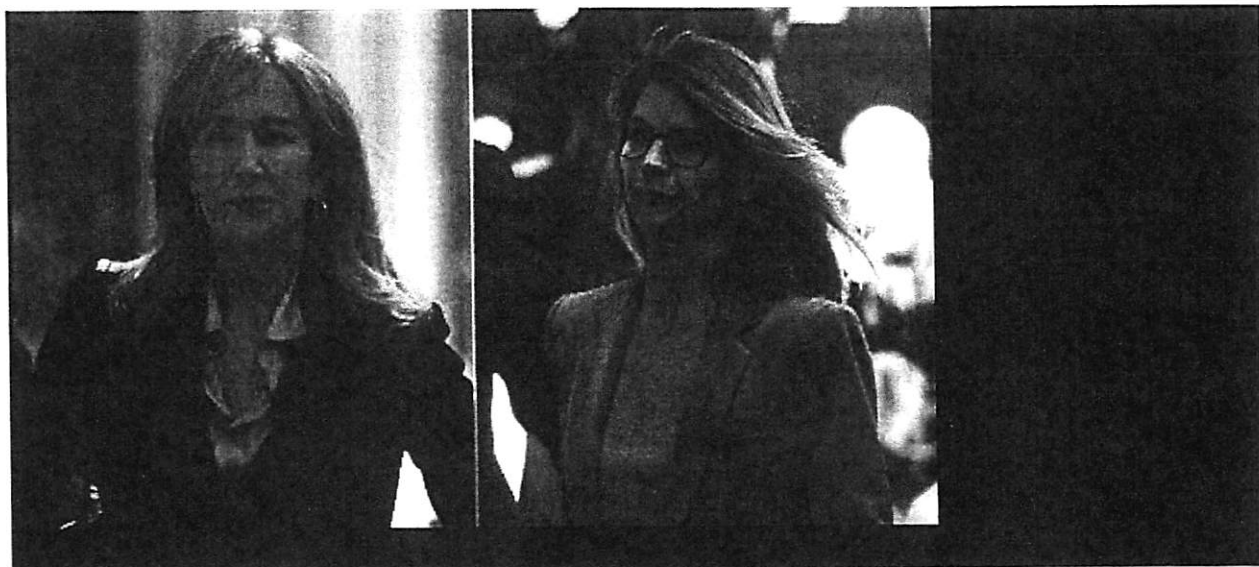
Updated 3:29 PM ET, Tue April 16, 2019

Loughlin pleads not guilty in college admissions scandal 00:56

(CNN)Federal prosecutors have been sending so-called target letters to people associated with the college admissions scandal, a law enforcement official with knowledge of the investigation confirmed to CNN.

People who have received them include students, graduates and other adults, and they are not all related to the same charge, the official added. The official wouldn't confirm whether the students or graduates are related to the parents already charged in the case or if they are new potential defendants.

Actresses Lori Loughlin and Felicity Huffman are among the high-profile figures caught up in the scandal, which has embroiled dozens of wealthy parents, college coaches and standardized test administrators. Prosecutors say some of the parents facilitated cheating on the SATs and ACTs on behalf of their children, and some parents bribed college coaches to smooth their children's path into college.



Actresses among dozens facing admissions scam charges 03:31

The target letters have been sent by the government since mid-March, when the case was first unsealed.

Content by Cabinet Office, Government of Japan

The economic power of art festivals in Japan's quiet regions

Arts festivals all over Japan are helping to change local communities for the better, bringing new people, ideas, and ways to make a living.

The Wall Street Journal and The New York Times first reported prosecutors' use of these letters.

Admissions scandal reveals 'aristocracy masquerading as a meritocracy'

These kinds of letters are standard in white collar cases, according to the official. They are used when prosecutors may not have all the evidence they need or they are not ready to arrest those who have received them. Other times, it brings recipients to the negotiating table more quickly than had they not received one.

In this case, the target letters could help prosecutors avoid arresting a young adult, according to the source.

As CNN has previously reported, more arrests are still expected in the scandal, and those arrests are said to include students.



Yale rescinds student's admission in wake of scandal 02:32

The scam unravels

The scam was first uncovered in March, when prosecutors unsealed indictments and criminal complaints charging wealthy parents, college coaches and administrators as part of a fraud to buy their way into some of the most prestigious universities in the country, prosecutors said. In all, 50 people were charged in connection with the scandal.

The mastermind of the plot was William "Rick" Singer, the head of his own company and sham charitable organization that got wealthy students higher scores on the ACTs or the SATs by helping them cheat. Singer would enlist the help of his

standardized test-taking guru, Mark Riddell, to take the exams for students or correct wrong answers, prosecutors said.

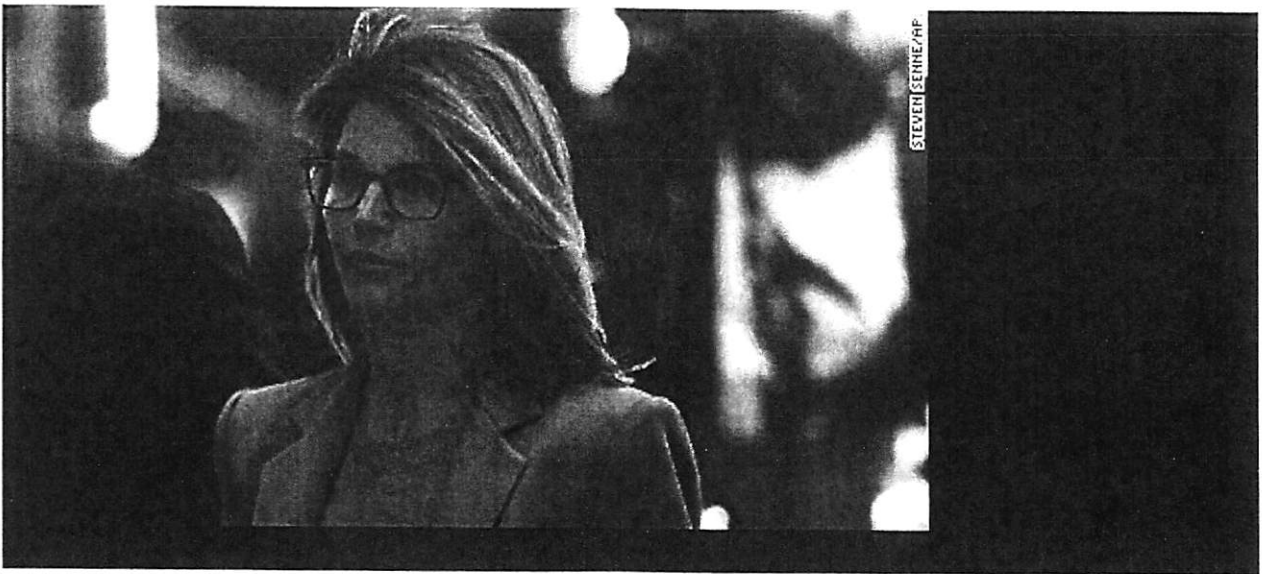
Acceptance rates at top colleges are dropping, raising pressure on high school students

In other instances, Singer would bribe college coaches and athletic officials to list wealthy students as new recruits for sports teams. Singer and those coaches knew those students were not competitive players, even going so far as to create fake profiles for them, prosecutors said.

"All of these things, and many more things, I did," Singer said as he pleaded guilty in March. "I created a side door that would guarantee families would get in."

Stanford expels student linked to \$500,000 donation to sailing program

Huffman was among 13 parents who chose to plead guilty last week to a charge of conspiracy to commit fraud. In exchange for the guilty plea, prosecutors said they will recommend a period of incarceration at the "low end" of the sentencing range and will not bring further charges against her.



Loughlin hit with new charges in college admissions scam 02:58

Loughlin and her husband, Massimo Giannulli, pleaded not guilty to conspiracy to commit fraud and conspiracy to commit money laundering, according to federal court filings entered Monday.

She and 15 other parents who also pleaded not guilty were additionally charged with conspiracy to commit money laundering, a move legal experts called part of the prosecution's "carrot and stick" approach, intended to pressure defendants to plead guilty or face further charges.

EXHIBIT No.

6

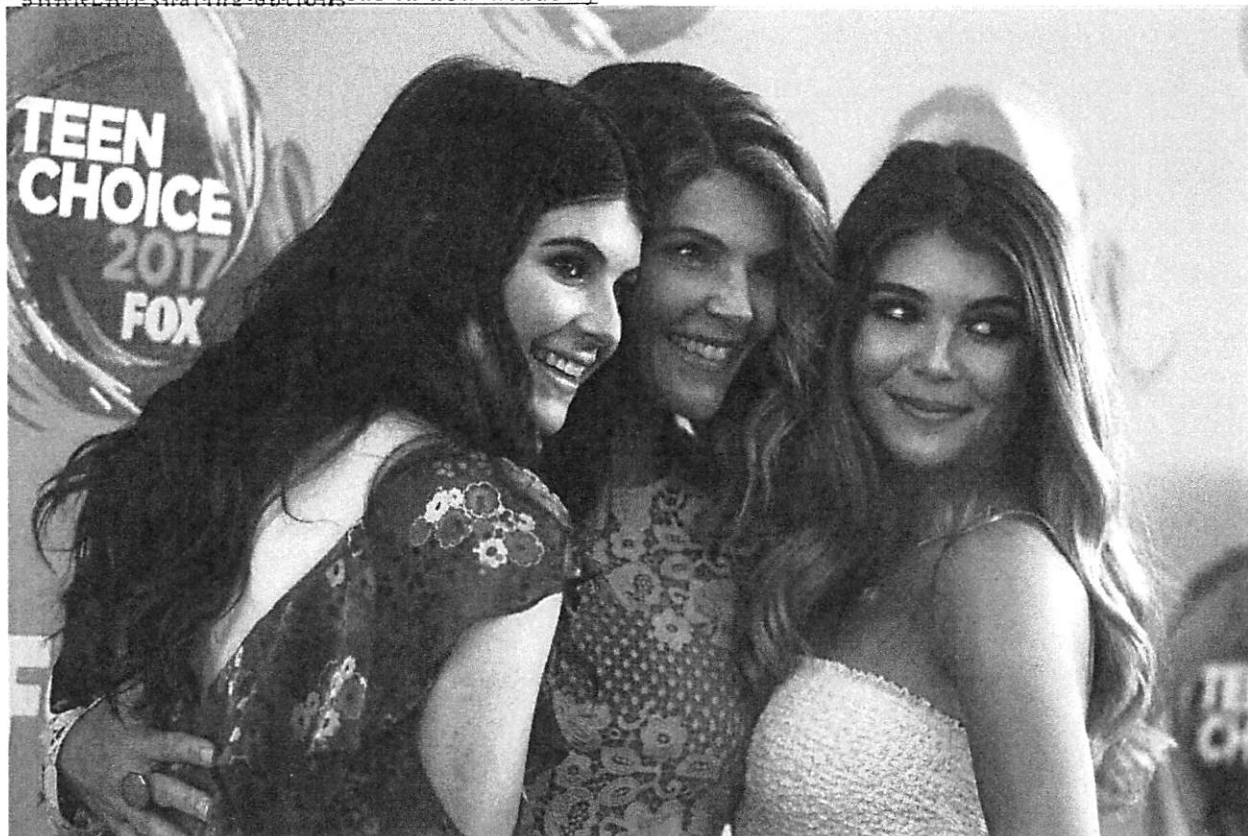
What Olivia Jade's exposed fake resume really means for Lori Loughlin

Olivia Jade's fake resume is out there. This could have a huge impact on the college admissions scandal

By [Herb Scribner@HerbScribner](#) Feb 18, 2020, 5:45pm MST

Share this story

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Bella Giannulli, left. Lori Loughlin, and Olivia Giannulli arrive at the Teen Choice Awards at the Galen Center on Sunday, Aug. 13, 2017, in Los Angeles. *Jordan Strauss, Invision via Associated Press*

Brand and reputation management expert Eric Schiffer has a theory about why federal prosecutors released [Olivia Jade's fake college athletics resume](#) — they could be building a case against her, too.

What's going on?

- Schiffer spoke to me on the phone after multiple reports shared Olivia Jade Giannulli's fake resume, which was presented in court filings in the college admissions scandal.
- According to my report for the Deseret News, prosecutors added the resume in their response to a motion by Lori Loughlin and Mossimo Giannulli that the FBI was holding back texts, transcripts and phone records.

Olivia Jade's (allegedly) fake rowing resume just brought me back to life.

Case 1:19-cr-10080-NMG Document 834-2 Filed 02/07/20 Page 2 of 2

██████████ GIANNULLI
COXSWAIN

██████████
Los Angeles, CA

PERSONAL

Graduation: 2018
██████████ High School

ROWING INFO

MAC ROWING

Coxswain

Skill Set

- Awareness, organization, direction and steering

COMPETITION

- 2016/2017 Head of the Charles-Boston
 - o 14th place-2017
 - o 11th place-2016
- 2015-2017 Head of the American- Lake Natoma
 - o 7th place 2016,2017
 - o 8th place 2015
- 2015-2017 Head of the Lagoon-Foster City
 - o 2017 4th place
 - o 2016/2015 5
- 2016/2017 Women's Varsity 8 boat, Men's JV 4 boat
- 2016 Fault Line Faceoff, Bronze medal
- 2015-2017 Christmas Regatta, Silver medal
- USRowing Southwest Regional Junior Championships,
 - o Bronze-2016
 - o Silver- 2015
- Marin Crew Festival
 - o Top 3 finish over the past 4 years
- San Diego Crew Classic
 - o Gold Medal-2016
 - o Silver Medal- 2015
 - o Gold Medal- 2014

Sparks Rowing programs:

- University of Washington, University of Florida, University of California, Los Angeles

USC has four boats which require 4 coxswains along with 2 back-ups. ██████████ would be fill the position of our #3 boat. Her sister is currently on our roster and fills the position of our #4 boat. Division 1 rowing programs use scholarships for the oarsmen but rarely with scholarship a coxswain. Although ██████████ is non-scholarship she is highly talented and has been successful in both men's and women's boats.

USC-00003894

- Schiffer said it may be the federal prosecutors way of hinting to Lori Loughlin and Mossimo Giannulli — who are accused of paying \$500,000 in bribes so their daughters Olivia Jade and Isabella Rose would be crew team recruits for the University of Southern California — that they may be building a case against their daughter.
- “You know, she may face her own charges,” Schiffer told me. “I mean, they released that document. Who knows what they’re gonna do? To me, that was a clear and present danger signal coming from the prosecution that she may get charged. And it’s a message to her parents that if they want to protect her daughter, they better play ball.”

The impact on Olivia Jade

- Though she hasn’t been charged in the scandal, the college admissions scandal has had a tremendous impact on Olivia Jade. She watched her partnership with Sephora disappear. She stopped posting her YouTube videos as much, which tainted her brand, too.
- Schiffer said Olivia Jade’s life won’t be the same — no matter if her mother and father are proven innocent.
- “She could get some secondary second-level brands that may be one of monetize off of her social media following,” he said. “But I’m not sure that anyone’s going to view her as someone that is a role model and someone that they can look to for good counsel.”
- Schiffer said Olivia Jade made mistakes along the way after the charges were filed against her parents. She posted on social media. She slammed the media. She’s shown a level of arrogance that doesn’t play with the public, he said.

Advice for clients

- Schiffer has some advice for celebrities who deal with the loss of their partners.
- Schiffer said: “Recognize the gravity of what you’re dealing with. And show respect to the process and the court and to cut down and if you’re going to fight, then fight and message a bit more about why you feel your innocence.”

EXHIBIT No.

7

Parent Who Turned Himself in Over College Scam Gets 2 Months

Janelle Lawrence and Patricia Hurtado. Bloomberg News

(Bloomberg) -- California surfing entrepreneur Jeffrey Bizzack, who turned himself in after most of the parents in the U.S. college admissions scandal were charged, was sentenced to two months in prison for paying \$250,000 to get his son into the University of Southern California through bribery and deceit.

Bizzack, 59, told a federal judge in Boston on Wednesday that his son was blameless. "I spent my life guiding him, protecting and teaching him, and all of this led to a reckless act," he said before receiving his term. Bizzack is in therapy, he said, and "really trying to understand what the future is going to be. I want to make sure I'm not the man ... who made those terrible decisions."

U.S. District Judge Douglas Woodlock also sentenced him to pay a \$250,000 fine and do 300 hours of community service, "hands on, with the underprivileged."

"You spend \$250,000 to cheat, the fine is \$250,000 for cheating exposed," he said. Before declaring the sentence, Woodlock grilled prosecutors, who had recommended nine months. He called the parents' deeds in the scandal a crime of "sneaky conspicuous consumption -- the kind of thing rich people can do that poor people can't because they have the money to do it, to obtain a good that impresses their friends."

"Do I think this is a serious crime? You bet I think this is serious crime," the judge said. Still, he added, "this is what seems to me a good man" whose "moral compass was demagnetized" for a time but who then "came forward and dealt directly with people who needed information."

In a filing, Bizzack's lawyers had asked for probation instead of prison. In court on Wednesday, once the judge said prison was necessary as a general deterrent, they sought one month.

Bizzack, a former executive of the World Surf League and business associate of surfing champion Kelly Slater, turned himself in after prosecutors announced charges against the initial 33 parents swept up in the biggest such sting the Justice Department has ever executed. A 35th parent was arrested in Spain last month.

Learning he was under investigation, he admitted his role in the scam and pleaded guilty in June to the same fraud conspiracy charge leveled at the other parents who pleaded guilty. He was the 12th to be sentenced, after another federal judge, Indira Talwani, sent all but one of the first 11 to prison in sentences ranging from two weeks to five months. One parent got a year's probation.

The racket's mastermind, Rick Singer, has pleaded guilty and cooperated with the government. None of the colleges or students in the scandal have been accused of wrongdoing.

Read More: Mom Gets Three Weeks in Test Scandal, Accused of Faking Race
In the sentencing recommendation they filed with the court, prosecutors said they had made a mistake in crafting plea agreements for the other 11 parents. Talwani concluded that the size of the bribes shouldn't drive the punishments and that the convicted parents should face a sentencing range of zero to six months. The U.S. used a different federal sentencing guideline for Bizzack.

But in court, the judge sided with Talwani, saying the amounts of the bribes were "meaningless because of all the various unknowns and estimates and speculations involved."

He hammered away on the bribes. The U.S. says Donna Heinel, a former USC athletics administrator who has pleaded not guilty in the case, took tens of thousands of dollars a month. In return, they say, she presented Bizzack's son to an admissions subcommittee as a nationally ranked volleyball recruit even though he never played the sport competitively.

"Where does it say the defendant is aware that \$20,000 each month was going to be paid to Donna Heinel?" Woodlock asked Assistant U.S. Attorney Kristen Kearney. Kearney acknowledged there was no such evidence.

Read More: Dad Gets 5 Months in College Scam, Stiffest Yet for a Parent
Singer secretly recorded conversations with his clients for prosecutors. If he was caught, Bizzack predicted last year during a phone call with Singer, "the worst case scenario" would be a perjury charge, the U.S. said. At the end of the call, Bizzack said he planned "to just keep my head down," according to prosecutors.

Defense attorneys had argued Bizzack should receive probation because he immediately came forward and admitted to his crime after learning he was under

scrutiny. He'd already resigned from his company and from board positions at other companies, they said.

"Mr. Bizzack has taken extraordinary, early and continuous steps to take responsibility for his conduct -- actions that speak louder than words," his attorneys said in a court filing. He met with investigators for both the government and USC, they said, and "talked openly and honestly," revealing everything he knew about the scheme.

Woodlock acknowledged that but said, "It's not overly compelling he did the right thing."

The case is U.S. v. Bizzack, 19-cr-10222, U.S. District Court, District of Massachusetts (Boston).

(Updates with Bizzack's lawyers' request in the second section and the two judges' sentencing rationales in the third)

To contact the reporters on this story: Janelle Lawrence in Boston at jlawrence62@bloomberg.net; Patricia Hurtado in Federal Court in Manhattan at pathurtado@bloomberg.net

To contact the editors responsible for this story: David Glovin at dglovin@bloomberg.net, Peter Jeffrey

EXHIBIT No.

8

Lori

Deposits Are Down at USC

Admitted applicants would have been making decisions at time when admissions scandal was receiving much attention.

By

Scott Jaschik

May 20, 2019

It's difficult to be sure of trends on admissions yield at any college. Admitted applicants are individuals -- and they have different college options, different educational goals and different finances. Someone who might seem a sure thing to accept an admissions offer can land elsewhere.

But with that (large) caveat, numbers of deposits to the University of Southern California are down by more than 7 percent as of May 15, compared to May 15 last year.

USC applications have been going up (and continued to go up this year). And a spokeswoman noted that USC feels that it is on track for a successful year. When colleges experience increases in applications and yields, they typically may admit smaller numbers of applicants, to keep yield totals on target. That is the pattern visible from data below.

While USC has seen numerous scandals in recent years, the one on admissions was capturing attention (and making USC look bad) just at the time admitted applicants would have been making their decisions.

Here are data on recent years' application cycles. The year refers to the fall when people would enroll. The deposits figure is as of May 15 for all years.

USC Admissions Data

Year	Applications	Admits	Deposits on May 15
2016	54,257	8,932	3,267

2017	56,653	9,025	3,528
2018	64,319	8,306	3,490
2019	66,062	7,551	3,152

Read more by

Scott Jaschik

Inside Higher Ed insidehighered.com/admissions/article/2019/05/20/university-southern-california-sees-decline-number-deposits

EXHIBIT No.

9

Lori - FBI Admission

12:20 p.m. ET, March 12, 2019

Some parents paid up to \$6.5 million for "guaranteed admission," FBI says



Joseph Bonavolonta, the FBI special agent in charge, said some parents paid millions of dollars to ensure that their children gained admission to prestigious universities.

"This is a case where they flaunted their wealth, sparing no expense, to cheat the system and set their children up for success with the best education money could buy — literally," Bonavolonta said.

Some parents sent as much as \$200,000 to \$6.5 million for "guaranteed admission," he said.

EXHIBIT No.

10

*Lori - College Admissions
in Booming*

The business of college advisors is booming. Here's how to navigate the consulting process

PUBLISHED FRI, MAR 15 2019 5:52 PM EDT UPDATED MON, MAR 18 2019 2:53 PM EDT

Michelle Fox@MFOXCNBC

KEY POINTS

- The college consulting industry is in the spotlight this week after dozens are arrested in an admissions bribery scheme masterminded by consultant William "Rick" Singer.
- Members of the profession condemn Singer's actions and point out that the charges illustrate the concern parents feel about getting their children into the right college.
- Here's how to find the right consultant and what you get for your money.



Helping kids get into college is a big business — and it's growing fast.

The industry gained some unwelcome notoriety early this week when dozens of people — including actresses Felicity Huffman and Lori Loughlin — were arrested in an [admissions bribery scheme](#).

The person behind it was William "Rick" Singer, founder of the Edge College & Career Network. He pleaded guilty to a number of charges, including racketeering, for masterminding the scheme, which included bribing college athletic coaches and having other people take admissions tests for the children of those who hired him.

Members of the profession swiftly condemned Singer's actions and pointed out that the charges exemplified the concern parents feel about getting their children into the right college.

"We know anxiety is off the charts. Part of the reason anxiety is off the charts is the decision-making in colleges has become so opaque," said Mark Sklarow, CEO

of the Independent Educational Consultants Association. “We see that parents are willing to do just about anything.”

His organization, a nonprofit that represents independent educational consultants, estimates there are about 8,000 people in the profession full-time, as well as thousands more who “dabble” in it.

The IECA has about 2,000 members — double the number from five years ago — who are required to abide by a code of conduct.

What you get for your money

The purpose of a college consultant is to help parents and their children navigate the application process, prepare for entrance exams and choose the right college — and it can cost a lot of money. The average hourly fee in 2018 was \$200, according to the IECA. Comprehensive package costs range from \$850 to \$10,000.

Chris Rim, founder and chairman of Command Education, told CNBC on Friday he creates a yearlong road map for students that includes their objectives and what they need to do to stay on track. His fees start at \$950 an hour.

“Because admission rates are so low, you can’t just have ... straight As, perfect or near-perfect SAT or ACT scores. You are going to need something that makes you stand out,” he said on “Power Lunch.”



A view of people visiting the University of Southern California on March 12, 2019 in Los Angeles, California. Federal prosecutors say their investigation dubbed Operation Varsity Blues blows the lid off an audacious college admissions fraud scheme aimed at getting the children of the rich and powerful into elite universities.

Allen J. Schaben | Los Angeles Times | Getty Images

Colleges want someone with a singular focus, not a well-rounded student, Rim said. "They want students who know what they want to do," not someone who is the president of six clubs, he added.

Private college counselor Sara Harberson touts her experience as the former associate dean of admissions at the University of Pennsylvania and the former dean of admissions at Franklin and Marshall College. She also worked as a director of college counseling at the Baldwin School in Pennsylvania.

"I teach them how to think like admissions officers. That's what parents want. They want to get the inside scoop," she said on "Power Lunch."

It's also more than just helping prep for entrance exams or filling out applications.

"If they do it right, they understand kids. They understand teenagers and really what is the very best essence of who that student is. Most students in high school, they do what everyone else does," added Harberson. Her rates go up to \$600 an

hour, but she said she also does free work and provides consulting at a low monthly cost.

How to find the right advisor

The first thing to figure out is if you even need one, said the IECA's Sklarow.

"If you are at a school that has a low student-to-counselor ratio, you may get all the help you need in a school setting," he explained.

Students who know they have to attend a state university or are only choosing between a couple of schools likely don't need to hire an advisor either.

The next step is to decide if you need a few hours of consultation to get headed in the right direction or if you need a full package of service, said Sklarow.

"Unless states are going to infuse and overhaul their college counseling programs at high schools, parents are going to want this. They are going to need it — all income levels.

Sara Harberson
PRIVATE COLLEGE COUNSELOR

When checking out potential consultants, parents should look at the messaging on their website and pay attention to what is said in the first "get-to-know-you meeting," Sklarow said. If it is all about getting into college, that's a short-term outcome. If it is about finding the right place where the student is going to thrive, that benefit lasts a lifetime, he said.

On top of that, check out the consultant's credentials. He suggests parents look for someone who has a background in counseling and find out how many colleges the person goes to each year. Ideally, it would be someone who spends one-third of the time on the road visiting campuses.

"So much of that match is to really understand the college socially, educationally and other ways," said Sklarow.

He also said it's important to make sure the person is vetted and is a member of a national organization that has already done a background check.

Scandal aftermath

While those in the industry "held their breath" after news broke about the admissions scandal, it now looks like it ultimately is starting to improve the profession, Sklarow said.

He's seen a spike in membership at the IECA over the last few days.

"Maybe in some ways this is going to lead to an industry that looks inwardly and finds a way to even improve on what we've been doing," he said.

Rim said he's already seen an increase in interest from potential clients. "Our phones have been ringing off the hook."

He thinks part of it is that parents "didn't know how competitive this process was. Just because you have perfect scores does not mean you are going to get in."

And it is something that isn't going to change — at least for now, said Harberson.

"Unless states are going to infuse and overhaul their college counseling programs at high schools, parents are going to want this," she said. "They are going to need it — all income levels."

EXHIBIT No.

//

Policy for Frosh Admission by Exception

Committee on Admissions and Financial Aid

Approved July 20, 2009

The Committee on Admissions and Financial Aid (CAFA) recognizes that some students with high potential for academic success and leadership may not have satisfied the UC requirements for eligibility. UC and CAFA have policies on admitting ineligible students as follows.

University of California Guidelines

Admission by Exception is the process by which a campus may admit applicants who have not achieved University of California Eligibility¹, or guaranteed admission to some campus, but who “demonstrate high potential for academic success and leadership.”² At most 6% of a campus’ frosh matriculants may have been admitted by exception, with at most 4% admitted based on “low socio-economic backgrounds or students having experienced limited educational opportunities.”

The Guidelines present 5 principles, summarized as:

1. Campus-level flexibility in admissions is essential to the University.
2. Admission by exception does not confer guaranteed admission to any other campus.
3. “Admission by Exception provides a means to identify students who do not meet numerical requirements for eligibility but who demonstrate strong likelihood of success at UC or exceptional potential to contribute to the University of the State of California.”
4. “Coordination of Admission by Exception with Comprehensive Review ... should guard against the unlikely event that applicants the campus determines to be less qualified for UC are admitted instead of applications the campus determines to be more qualified.” But, lack of an eligibility criterion must “not automatically classify a student as non-competitive.”
5. “Admission by Exception also permits campuses to seek improvement in admission procedures by applying alternative criteria to small numbers of applicants and monitoring those students’ subsequent performance at UC.”

The Guidelines recommend (1) maintenance of the 6%/4% ceilings; (2) faculty development of written policy on each campus; (3) evaluation using comprehensive review criteria with the potential for additional procedures, such as letters of recommendation; and (4) “periodic reviews to ensure that

¹ Eligibility is most often conferred by completing a pattern of courses (“a-g”), achieving a 3.0 GPA, and completing the ACT or SAT tests. In the SAT case, the three-part reasoning test and 2 subject tests are required. Students may also be eligible by being in the top 4% of their class or scoring very well on the tests. For Fall 2012, BOARS’ new Entitled to Review structure will significantly change admissions guarantees. http://admissions.ucsc.edu/apply/freshman_guide.cfm

² All quotations are from *Guidelines for Implementation of University Policy on Admission By Exception*, Endorsed by the Academic Council on September 28, 2005, as submitted by the Board of Admissions and Relations with Schools. <http://www.universityofcalifornia.edu/senate/committees/boars/a.by.e.guidelines.1005.pdf>.

students admitted through the process are maintaining satisfactory academic success, that the goals of the process are being met, and that campus and University policies are being followed.”

Finally, the Guidelines differentiate 6 categories of applicants, discussed latter in this document.

Santa Cruz Campus Policy

While UC eligibility informs the process of frosh admission, the primary determinant of admission is the UCSC comprehensive review system, as established by the Committee on Admissions and Financial Aid. The system balances academic achievement measures with other measures designed to enhance opportunity for applicants with “high potential for academic success and leadership”. The system determines which applicants are admitted to the Santa Cruz campus. Applicants who are not UC Eligible and score above the annual cutoff (the point value above which all eligible students are admitted) may be admitted “by exception”.

Applicant Categories

The Guidelines provide 6 categories. Their applicability to UCSC is discussed in turn.

1. *Applicants who have overcome personal challenges that have affected their ability to meet UC eligibility requirements and who demonstrate strong potential for success at UC.*

The comprehensive review system takes into account several measures of challenge, such as being a first-generation college student, coming from a low-income family, or attending an under-performing high school. Applicants in this category that receive a comprehensive review score, subject to course pattern rules discussed below, that is greater than the annual cutoff may be admitted by exception after qualitative review.

When an applicant requests consideration due to a disability, the case will be reviewed in collaboration with the Disability Resource Center. If a compelling application falls below the annual threshold, it may be brought to the committee or committee chair for discussion.

2. *Applicants from nontraditional high school settings that have adversely affected their ability to complete UC’s eligibility requirements, but who nonetheless demonstrate strong potential for success at UC.*

The Office of Admissions is directed to use its best judgment in conservatively converting nontraditional records into the campus’ comprehensive review system. Applicants in this category that receive a comprehensive review score, subject to course pattern rules, that is greater than the annual cutoff may be admitted by exception after qualitative review.

3. *Applicants who demonstrate extraordinary talent in a specific academic area such as mathematics, writing, science, or language.*

The comprehensive review system includes points for achievement in a specific subject area, regardless of eligibility, as well as points for regional, statewide, and national academic accomplishments. Applicants in this category that receive a comprehensive review score,

subject to course pattern rules, that is greater than the annual cutoff may be admitted by exception after qualitative review.

4. *Applicants who demonstrate other exceptional talent, accomplishment, or potential in specific areas such as performing arts, athletics, leadership, or contribution to the community.*

The comprehensive review system includes reader points in these areas, regardless of eligibility. Applicants in this category that receive a comprehensive review score, subject to course pattern rules, that is greater than the annual cutoff may be admitted by exception after qualitative review.

5. *Applicants whose enrollment would enable campuses to establish new majors or academic programs.*

The UCSC frosh admissions criteria are independent of proposed major.

6. *Applicants who have achieved academically at a level equivalent to those of UC-eligible applicants but who have narrowly missed meeting one or more of UC's eligibility criteria, generally for a technical reason such as a late or missing test scores when the applicant has otherwise demonstrated proficiency.*

Applicants in this category that receive a comprehensive review score, subject to course pattern rules, that is greater than the annual cutoff may be admitted by exception after qualitative review. Some applicants enter this category as 'administrative commitments' after admissions.

Comprehensive Review of Ineligible Applicants

The Committee recognizes the accomplishments of applicants through its system of comprehensive review scoring. The scoring is independent of eligibility, with the following comments and exceptions.

- *Ineligible due to low grades or test scores.*
Low grades or test scores are accounted for in the comprehensive review scoring system.
- *Ineligible due to missing English or Mathematics.*
Applicants who have not completed (b) English, 4 years, or (c) Mathematics, 3 years, will not be admitted to the Santa Cruz campus, and are encouraged to complete this work at community college and reapply. This is a long-standing campus practice.
- *Ineligible due to missing one unit (year) or less of an (a) or (d)-(g) subject.*
Applicants missing up to one year of an (a) or (d)-(g) subjects, or, for example, one half year in each of two different subjects, with sufficiently high comprehensive review score, may be admitted after qualitative review.
- *Ineligible due to missing more than one unit (year) of (a) and (d)-(g) subjects.*
Applicants missing more than one year of the UC course pattern will not be admitted, and are encouraged to complete the work at a community college and reapply.

Qualitative Review

Ineligible applicants with an adjusted comprehensive review score above the annual cutoff are subjected to a final qualitative review to confirm that they “demonstrate high potential for academic success and leadership”, and are then admitted.

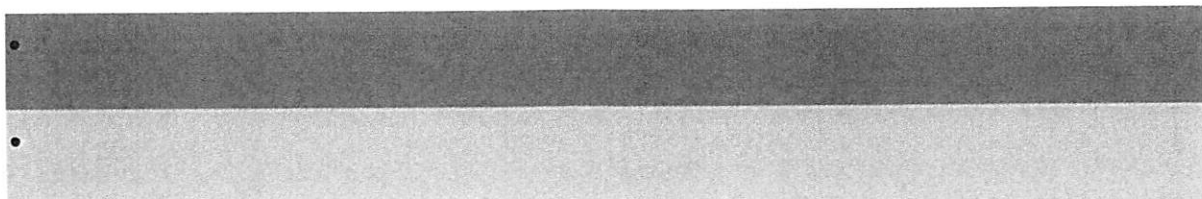
CAFA may additionally permit 0% to 1% of the incoming frosh class, ineligible (admission by exception) or eligible (selection by exception) to be admitted using predefined experimental alternative or additional criteria, in an effort to improve admissions procedures and seek candidates that “demonstrate high potential for academic success and leadership.” Use of this option takes place in close collaboration with CAFA, and may be related to programs such as Summer Bridge or to other campus goals. After careful monitoring, such criteria may be fully integrated into the comprehensive review system.

The Office of Admissions shall report to the committee on the number and character of potential offers of admission by exception prior to making those offers, and on probable conformance to the system-wide maxima. If the 4%/2% criteria may be exceeded, the number of admission by exception offers will be reduced by dropping the lowest-scoring students within each category until probable compliance is reached. After the first year, post-admission reporting and review of the performance of prior admission by exception students will also be presented. Admission by exception students should be flagged within campus databases to simplify evaluation of the efficacy of this program.

EXHIBIT No.

12

Behind UC's 'admission by exception' side door: sports, money, diversity — and secrecy



-
-



UC Riverside's 'exceptional' admissions include athletes, disadvantaged students and homeschooled. (Felicia Mello — CalMatters)

By **FELICIA MELLO** | CALmatters

PUBLISHED: August 19, 2019 at 3:21 a.m. | UPDATED: August 19, 2019 at 8:41 a.m.

Each November, tens of thousands of high school students file their applications to the University of California and an army of admissions staffers begins deciding who will be accepted to the nation's most prestigious public university.

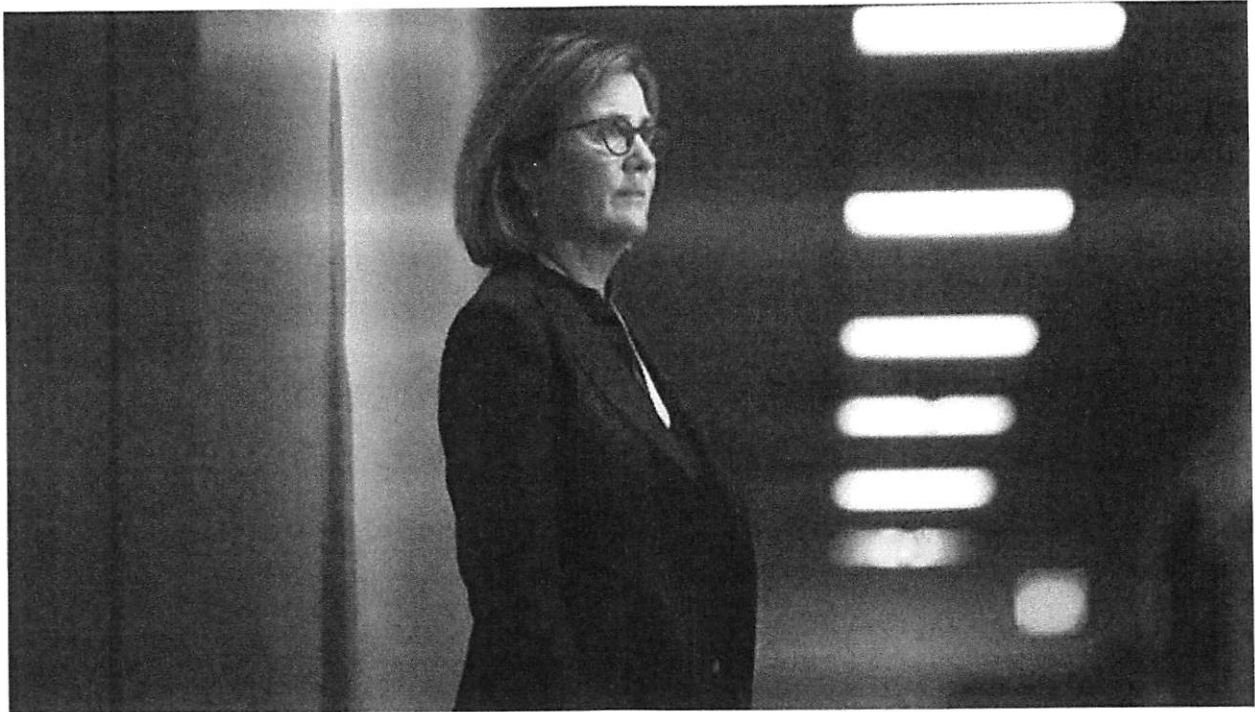
Now, the [Varsity Blues scandal](#) has cast a spotlight on a once-obscure part of that admissions process. Known as "admissions by exception," it gives campuses flexibility to admit up to 6% of each entering class from applicants who don't meet UC's minimum standards, but have a special talent or come from a disadvantaged background.

While it's unclear if admissions by exception played a direct role in the college cheating scandal, it has surfaced as a potential weak spot as policymakers seek ways to bulletproof the university's admission system from scammers.

Documents and interviews with admissions officers show UC's nine undergraduate campuses are using the policy in very different ways — ways that some campuses prefer to keep secret, even after an internal UC audit urged more transparency.



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In response to a public records request from CalMatters, for instance, most campuses said they had no documentation of how many students are admitted by exception each year. At least one campus exceeded the 6% cap in 2018.

Just one campus — UCLA — provided records outlining the total numbers and demographics of students admitted under the policy, while two others — UC Santa Cruz and UC Riverside — detailed how they select the exceptional admits.

Together, the three campuses offer a glimpse of how admissions by exception works and how campuses use it to their advantage. Perhaps best known as a tool for athletic recruitment, the policy also helps campuses open access to non-traditional students, and even shore up their bottom lines.

UCLA: A leg up for athletic stars

At highly-selective UCLA, most of the 132 students admitted by exception in 2018 came from California, according to documents obtained under CalMatters' public records request. All but about a dozen were athletes or possessed other special talents.

While athletes made up the bulk of that group, UCLA spokesperson Ricardo Vazquez said it also included applicants with skills in music and art. More than a third had grade point averages below 3.5, well under the 4.25 median GPA for all admitted freshmen that year. The GPAs of another quarter of admits are listed as "missing."

“Extraordinary talent of any sort, athletic or otherwise, can limit a student’s ability to meet eligibility requirements because of the time commitments some of those activities may involve,” Vazquez wrote in a statement to CalMatters.

UCLA has long used admission by exception for athletic recruitment. Its officials told the NCAA in a 2011 report that about half of all student-athletes were admitted via the policy — including 85 percent of football players on scholarship — compared with fewer than two percent of incoming freshmen overall.

The practice is not without risks. UC Berkeley overhauled its admissions process for athletes five years ago after revelations that graduation rates on its men’s football and basketball teams ranked last in the country. But UCLA officials wrote in 2011 that “given UCLA’s highly competitive academic reality for admitting first-year students in general, there is no real alternative ... if UCLA is to compete athletically with any success.”

Recruits recommended by coaches must be reviewed for admission by exception only if they lack the minimum qualifications for UC. Those include earning a C or better in each of a sequence of college prep courses, including four years of English and three years of math; averaging at least a 3.0 GPA; and taking the SAT or ACT.

UCLA’s admission practices have come under scrutiny since soccer coach Jorge Salcedo was ensnared in the nationwide college admissions scandal, charged with accepting \$200,000 in bribes from wealthy families to recruit their children as players. A recent Los Angeles Times investigation identified a handful of students with close ties to athletics department employees who were recruited as athletes despite appearing to have little experience in their sports.

Vazquez declined to comment on whether admissions by exception played a role in those cases, citing student privacy. He said the university is reviewing its use of the policy, which has become increasingly limited to unusually talented students as UCLA has grown in popularity: For some years, it has received more applications than any other university in the United States.

UC Riverside: Homeschooler advantage

Like UCLA, UC Riverside fields Division 1 sports teams, but campus policy limits the number of athletes admitted by exception to 1% of each entering class. Instead, the campus targets those students with extreme educational disadvantages, said undergraduate admissions director Emily Engelschall.

Riverside’s admissions by exception, she said, tend toward students who were homeschooled, experienced a medical emergency that delayed their coursework, or “come from a foster care environment who’ve attended 10 different high schools throughout their career.”

Even students admitted by exception to UC Riverside must have at least a 3.0 GPA and meet minimum test score cutoffs, said Engelschall — a stricter standard than at other campuses. Those requirements can be waived, however, if a special faculty review committee signs off.

Eddie Comeaux, a professor of higher education at UC Riverside, said such committees sometimes fail to adequately assess whether students they're admitting have the skills and support to succeed at the university.

"Sometimes they become a rubber stamp, and there's not a thoughtful, evidence-based approach," said Comeaux, who chairs the UC-wide faculty panel charged with overseeing admissions policy.

Athletes in sports that don't generate revenue for the university are among those who can receive a cursory review, Comeaux said. "So much of that is under the radar because these are athletes that are not high profile."

At least two people review every application granted admission by exception at UC Riverside, said Engelschall — but that's not true for every campus, an internal UC audit found. In some cases, a single individual makes the selection, according to the June audit, the first of three to examine ways to improve UC's admissions procedures in the wake of Varsity Blues.

A bill pending in the state Legislature aims to address that: Authored by Sacramento Assemblyman Kevin McCarty, it would require that at least three senior administrators sign off on every student admitted by exception to UC and CSU.

UC Santa Cruz: Out-of-staters — and tuition

UC's internal audit also found that campuses are not consistently measuring how many students they admit by exception, and sometimes fail to document the reason for the decision. UC Santa Cruz, for example, admitted about 8% of its entering class by exception in 2018, exceeding the 6% allowed under UC rules.

Michelle Wittingham, associate vice chancellor of enrollment management, said the way the university handled those applications — which were flagged by a reviewer, given a score between 1 and 5, and then lumped in with the regular pool — made it harder to track compliance with the cap. But she added that the university is "going to really be looking closely into that."

UC Santa Cruz has used the program to recruit students from outside California who have strong academic records but didn't take a required class, Wittingham said: "You might be missing a year of English, but we see that you had senior English and got great grades and had strong test scores."

The university is working to increase its population of non-resident students, Whittingham said, both to expose California students to other cultural influences and bring in the extra tuition dollars those students pay. About 86% of the 282 students the campus admitted by exception in 2018 came from outside the state, she said, and “not shockingly, curriculum in other countries is not aligned to UC requirements.”

Whittingham took care to emphasize that non-resident students who come in by exception aren’t displacing California residents — the number of in-state students, she said, is determined by state funds.

UC-wide: Promoting diversity?

UC President Janet Napolitano has said the university will follow the audit’s recommendations, which include requiring campuses to track why they admit each student by exception and ensure that multiple people evaluate each file.

While UC says only about 2% of newly enrolled students systemwide enter via the policy, that still amounts to hundreds of students. The university sent acceptance letters to a record 108,178 freshmen for fall 2019, including 71,655 Californians. About 62% of California applicants got in, though not necessarily to their first-choice campus.

In some ways, admissions by exception may be contributing to campus diversity. California students admitted via the policy in 2018 were more likely to be black than those in the entering class overall — though less likely to be Latino or first-generation. Black students, who are underrepresented at UC compared to their share of California’s population, made up about 10% of in-state students admitted by exception, double their share of total admitted students from the state.

At a recent meeting of UC’s governing board, some university regents worried that tightening oversight of admissions by exception too much — for example, by requiring more students to submit documents verifying claims they make in their applications — could adversely affect disadvantaged students.

“Folks that are being admitted by exception ... might be in the least favorable position to provide a lot of verification,” said regents vice-chair Cecilia Estolano. “Those are super-important categories for us to ensure that we’re opening access to really amazing, talented people that just don’t have opportunities to show that in their high school.”

But Wei-Li Sun, an admissions consultant who specializes in helping students apply to UC, says the practice seems less to benefit disadvantaged students overall than to target specific groups.

“You’ve got your out of state students who bring in money, you’ve got your athletes who are going to win, and you’ve got your homeschool students who tend to outperform the regular students, so it makes sense for the UCs to want them,” she said.

Bay Area-based admissions counselor Felicia Fahey said she’s helped two clients gain admission by exception — one a homeschooled student who attended UC Berkeley, and another a skilled writer who was admitted to UC Davis after a heart surgery that affected her grades.

“(The second student) had clearly overcome this problem and was performing at a really high level,” Fahey said.

On basic data, ‘surprising’ secrecy

Whatever their reasons, some UC campuses are clearly reluctant to share data on admissions by exception. Four months after CalMatters sent public records requests to each of the nine undergraduate campuses seeking information about the number and demographics of students admitted under the policy, only UCLA has provided any documents. UC Riverside and UC Santa Cruz made admissions staff available for interviews.

The other six campuses either failed to respond or said they did not have records that answered any of our questions — even the most basic one about how many students were admitted by exception last year.

When CalMatters followed up, pointing out that UC’s own internal audit was examining that question, some campuses agreed to look into our request — but had yet to provide any documents by deadline.

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More details could emerge when the university conducts a second internal audit of its admissions over the next six months, followed by an independent state study requested by the Legislature.
Assemblymember Tasha Boerner-Horvath, the San Diego Democrat who asked for the state audit, said she found campuses’ lack of documentation “very surprising.”

"It's a more subjective admissions process than the rest of admissions," she said. "Is that something that can be theoretically abused? Yes. Are they doing enough due diligence to ensure it's not being misused?"

This story and other higher education coverage are supported by the College Futures Foundation.

CalMatters.org is a nonprofit, nonpartisan media venture explaining California policies and politics.

New California Laws Address College Admissions Scandal

October 4, 2019 at 3:38 pm

Filed Under: California law, College Admissions Scandal

SACRAMENTO, Calif. (AP) — California Gov.

Gavin Newsom signed three laws Friday in response to a college admissions scandal where more than 50 people have been arrested and accused of using bribes to get their children into elite schools.

The laws tighten rules on when colleges can admit students who don't meet standard eligibility requirements; require schools to tell the Legislature if they give preferential treatment to some applicants; and prevent people found guilty in the scandal from receiving tax benefits stemming from bribes that might have been disguised as charitable contributions.

"This package of bills strikes at the forces that keep the doors of opportunity closed to too many people in our state," Newsom said.

The admissions case included Hollywood stars Felicity Huffman and Lori Loughlin, who face charges for their part in a scheme where wealthy parents paid college coaches to get their kids into schools.

Jeffrey Bizzack, a California real estate developer, pleaded guilty in July to paying \$250,000 to get his son into the University of Southern California as a fake volleyball recruit. Another defendant is accused of paying \$400,000 to get her son into the University of California, Los Angeles as a fake soccer recruit.

The laws are among 21 bills relating to higher education that Newsom signed into law. Some underwent significant changes before getting passed by the Legislature.

One proposal would have banned California colleges and universities from giving preferential treatment to applicants related to donors or alumni or risk losing state-funded benefits, such as Cal Grants — taxpayer money that students can use to pay for college that they don't have to pay back.

Eventually, the bill was changed to require colleges and universities, both public and private, to tell the

state Legislature if they use preferential treatment in their admissions process.

“We should know how prevalent donor and alumni-based preferential treatment is in California, so we can compare that to the amount of state-funded benefits, like CalGrants, flowing toward the school,” said bill author Assemblyman Phil Ting, a Democrat from San Francisco.

Another law, authored by Democratic Assemblyman Kevin McCarty, makes changes to when state-funded schools can admit students who don’t meet the school’s admission requirements. The University of California and California State University systems have “admission by exception” policies.

The new law requires at least three senior campus administrators to approve an exception. Plus, schools must document who those administrators are and must have a policy for an acceptable rationale for every admission by exception.

University of California system spokeswoman Sarah McBride said the school will review the law’s requirements. She noted the school has already audited its admissions procedures and made

changes, including coming up with a rationale for admission by exception decisions.

“We share the outrage and concerns over fraudulent activity to try to gain admission at public and private universities across the nation, including in a few instances at the University of California,” McBride said.

EXHIBIT No.

14

Fury - when Admissions Adviser Singer Called.

When Admissions Adviser Rick Singer Called, This School Said, 'No, Thanks'

Years ago, Occidental College opted not to use admissions to chase money. The decision came with a cost.

By

Jennifer Levitz and

Douglas Belkin

Nov 6, 2019 5:30 am ET

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205 RESPONSES

One day in 2012, an admissions director at Occidental College got a surprising email. William "Rick" Singer proposed that the school reconsider an application from an academically challenged daughter of a wealthy family.

He wanted the school to overturn her rejection, and he suggested the parents would give the school money above and beyond tuition.

"Are you kidding?" an incredulous Mr. Singer wrote about her not being admitted. "We can create a win-win for both of us."

Vince Cuseo, the admissions official at the small California liberal-arts school, gave a simple response: No.

Mr. Singer, the admitted mastermind of what federal prosecutors have called the largest admissions-cheating scandal in the country, had reason to be hopeful. He had made inroads into brand-name colleges and universities around the country scores of times, exploiting higher education's focus on money and willingness to give extra consideration to wealthy applicants.

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The College That Said No to Rick Singer

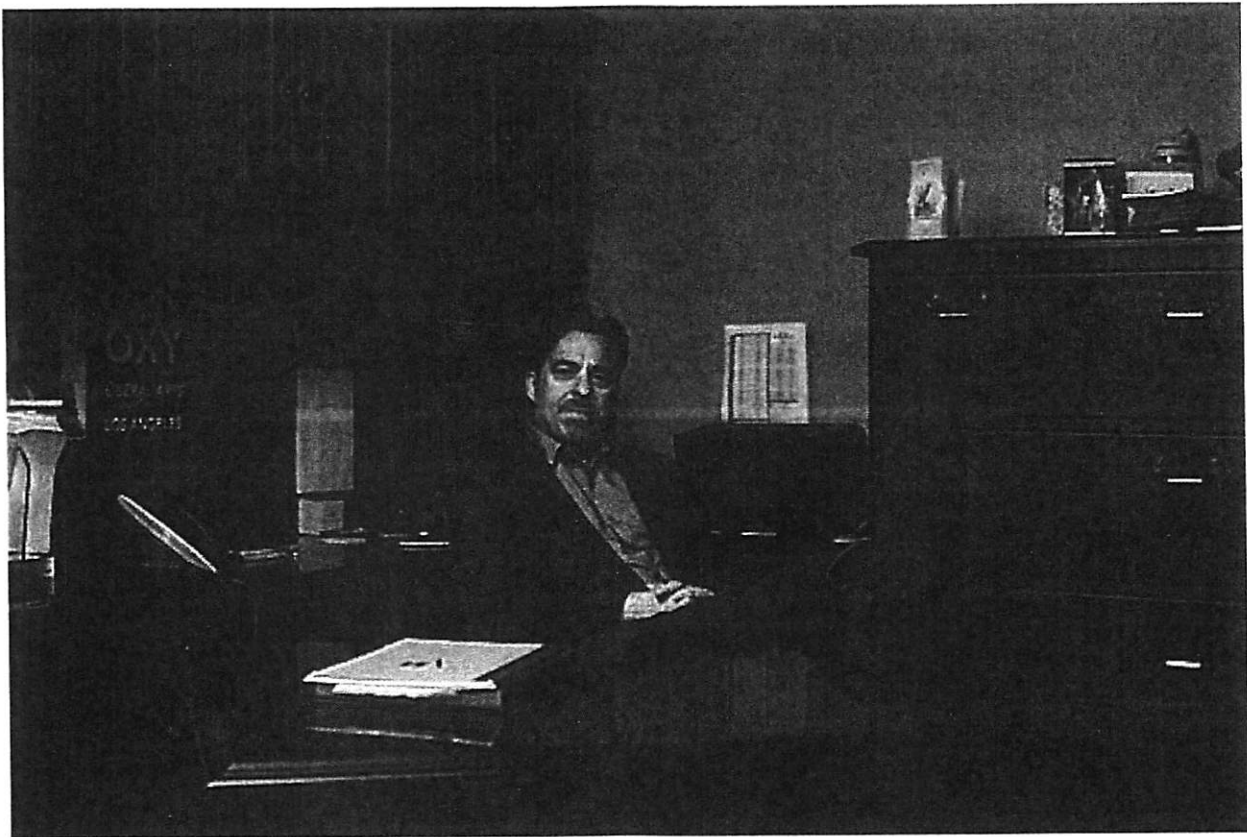
SHARE YOUR THOUGHTS

Should more schools follow Occidental's lead? If so, why? Join the conversation below.

Mr. Singer's illegal operation has spawned criminal charges against 52 people, 29 of whom have pleaded guilty or plan to. It has also further highlighted the role of money in admissions, and the often wide gulf between high ideals of meritocracy and mercenary business practices.

Occidental, a small, private liberal-arts college in Los Angeles, has charted a different path. Two generations ago, it opted out of the chase for well-heeled students and put its money into scholarships for less well-off minorities.

Those decisions, however, have come at a cost. Occidental's \$434 million endowment is roughly \$70 million smaller than what it might have been had the school prioritized prestige and wealth, according to Amos Himmelstein, the school's vice president for planning and finance. While the school boasts beautiful beaux arts architecture and is building a new aquatic center, the infrastructure hasn't kept up with improvements made by its peers, he says.



Vince Cuseo rejected a proposal from college consultant Rick Springer in 2012 to admit an academically challenged daughter of a wealthy family. PHOTO: MATTHEW SCOTT GRANGER FOR THE WALL STREET JOURNAL

The question, Mr. Cuseo says, is at what price “are you willing to sell your soul”?

The once-booming age-old business model of higher education faces tremendous pressure due to demographic changes, disruptive technology and the tightest labor market in half a century.

As a result, colleges and universities face rising incentives to cut corners or outright lie to boost rankings. They are also under pressure to use legal backdoor strategies to attract affluent students and donations to boost bottom lines.

Mr. Singer exploited these forces to create what he called his side door strategy, in which he bribed college coaches to tag clients’ children as walk-on athletes even though they didn’t play the sport. He also rigged SAT and ACT scores.

Occidental has largely resisted these temptations. A turning point for the school came in the 1980s, as Los Angeles transformed into one of the nation’s most diverse

cities. Occidental trustees, many local business owners themselves, felt there weren't enough educated minorities to fill jobs. Occidental reworked its curriculum and enrollment practices to draw more black and Latino students, said Eric Newhall, a retired Occidental English professor who headed the school's faculty council at the time.

Related Video



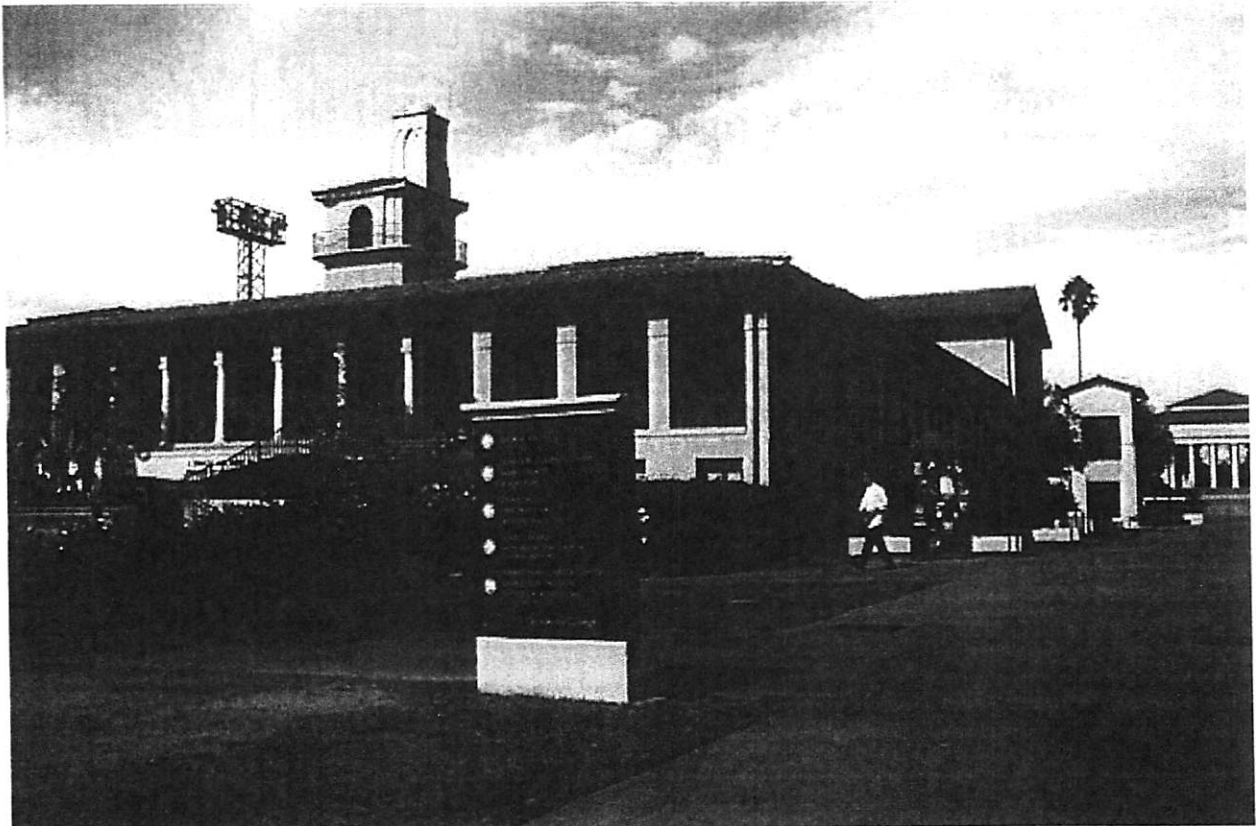
Federal prosecutors detailed a more than \$25 million scam to help wealthy families bribe their way into elite colleges. The scheme allegedly involved bogus exam scores and falsified athletic achievements.

The school emerged as one of the nation's most racially and socioeconomically integrated private schools, long before many universities were prioritizing diversity.

One concern across the school quickly arose: If it turned away wealthy white students, who would pay the bills? The question divided the school, said Mary Weismantel, a young professor at Occidental in the 1980s who now teaches at Northwestern University.

Today, Occidental is 49% nonwhite and attracts fewer wealthy students than the vast majority of its peers. It also boasts one of the highest percentage of poor and working-class students receiving Pell Grants and has one of the highest rates of economic mobility of its peers, according to Harvard economist Raj Chetty and Occidental.

But financial stress has followed. In 1995 Occidental's endowment ranked 120th in the nation. By last year it was 208th.



Occidental resisted pressure to use legal backdoor strategies to attract affluent students and donations to boost the college's bottom line. PHOTO: MATTHEW SCOTT GRANGER FOR THE WALL STREET JOURNAL

The school has lost ground partly because of its commitment to enroll poor and working-class students who need grants. Occidental's need-blind enrollment program climbed from 11% of the budget in the mid-1980s to 24% by 1993. That December, then-President John Slaughter said the increase in financial spending "has escaped the boundaries of reasonableness," according to an alumni publication.

The school eventually had to dip into its endowment to pay the bills. And today, while it maintains a strong reputation and a middling \$434 million endowment, it still faces underlying fiscal issues.

In September, Moody's Investors Service revised the outlook on Occidental's \$84 million in debt, which has a solid Aa3 rating, to negative from stable, citing the school's "commitment to affordability" and lagging fundraising.

These headwinds mean dormitories are cramped and nearly half are without air conditioning. The steel lawn-irrigation system installed in the 1930s is thoroughly rusted out. The campus is pretty and tranquil, but amenities pale when compared with those offered elsewhere: lazy rivers, palatial fitness centers, climbing gyms, high-tech libraries and swanky apartment-style dorms.

"Does that influence incoming freshman? I think it does," said one prominent alumnus, who has been active in fundraising. "The sad reality is that colleges that have leveraged white wealthy students have really prospered."

Unlike other schools, it doesn't heavily prioritize athletes or legacies in admissions.

Occidental fields 21 varsity teams but offers little credit in the admissions process for athletic prowess, according to school officials. The idea isn't to be the best but to stay competitive, said Mr. Cuseo, now the vice president for enrollment and dean of admissions. In 2017 the school had to cancel the last four games of the football season because there weren't enough healthy players. The team has since rebuilt.

RELATED

- For Sale: SAT-Takers' Names. Colleges Buy Student Data and Boost Exclusivity (Nov. 5)
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In September, a study analyzing admission data at Harvard showed 43% of white students are either athletes, legacies or were children of donors or faculty. A similar count at Occidental was 18%, school spokesman Jim Tranquada said.

Occidental also resists gaming the rankings. Perhaps the most widespread strategy to manufacture an appearance of selectivity is lowering the bar for applicants in order to attract more. That generates more rejections, making a school appear more selective. Occidental hasn't done this.

"There are a lot of things you can do that are pretty simple, and I've been in faculty meetings where it's been discussed," said Occidental Professor John McCormack. "But it's just not who we are."

In 2004, Mr. Singer assembled an advisory board for his then company CollegeSource, which at the time had a legitimate division. The board included five prominent higher-education figures, including Ted Mitchell, then president of Occidental.

Mr. Mitchell, who left Occidental in 2005, has said he was an unpaid adviser to Mr. Singer's venture 15 years ago to provide counseling to low-income students.

The prominent Occidental alumnus who also knew Mr. Singer recalls hearing Mr. Singer call Occidental "dumb" for having what he portrayed as too thick of a wall between admissions and fundraising departments.

Mr. Cuseo says he has never felt pressure to take any of the students if they don't meet school standards. Five years ago, the development office recommended he look at an applicant whose prominent and widely known name made his "eyes kind of open up," he says.

Yet, "it was pretty darn clear that the student didn't deserve to be admitted to Occidental," he says. The school rejected the teen.

Mr. Cuseo said the email from Mr. Singer in 2012 was extremely unusual. An upset Mr. Singer requested a meeting to discuss helping his client's child "find her way to becoming a student at Occidental" after she had been rejected. Mr. Singer also criticized Occidental's admission policies.

"You are off base," Mr. Cuseo replied.

Write to Jennifer Levitz at jennifer.levitz@wsj.com and Douglas Belkin at doug.belkin@wsj.com

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EXHIBIT No.

15

Insidehighered.com /news/2012/07/03/report-finds-alumni-giving-among-other-areas-correlated-football-success

The Gridiron Payoff?

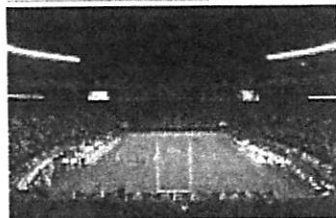
Report says college football success is correlated with increases in alumni giving, applications, academic reputation and incoming students' SAT scores.

By

[Eli F. Young](#)

July 3, 2012

[13 COMMENTS](#)



A win on the football field gives both fans and administrators a reason to celebrate, according to a new report that found football success increases a college's alumni donations -- especially to athletics programs -- along with its academic reputation and the quality and quantity of applicants.

The working paper -- "The Benefits of College Athletic Success: An Application of the Propensity Score Design with Instrumental Variables" -- was published by the [National Bureau for Economic Research](#), which has published before about the [relationship](#) between academic success and alumni giving.

Other reports have found correlations between athletic success and positive effects such as an increase in alumni giving, but they have been criticized for creating a cause-and-effect relationship that could actually be operating in the reverse -- colleges' athletics programs could be flourishing because of increased donations, instead of the other way around.

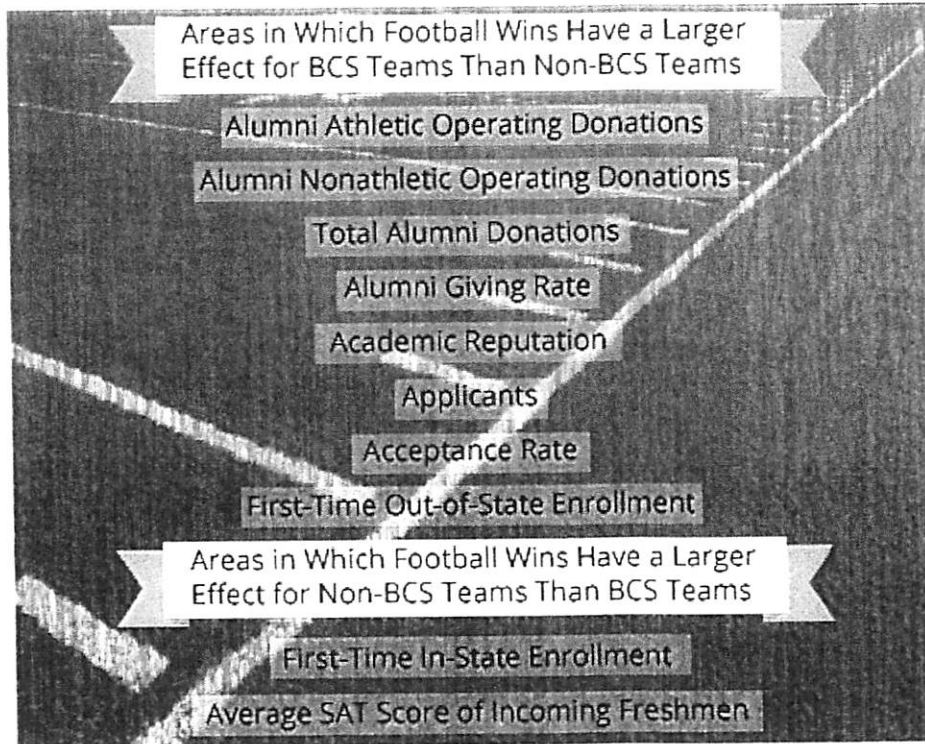
But Michael Anderson, an assistant professor of agricultural and resource economics at the University of California at Berkeley and the report's author, used propensity score design -- comparing colleges that have an equal chance of winning a game -- to create his data and adjust for a lot of the ambiguity in previous reports. When possible, data from 1987 to 2009 were collected.

"The basic intuition there is, 'O.K., well let's get the odds from Vegas, and let's match up teams that had the exact same chance of winning going into the game, and then one of them won for whatever random reason,' " he said, adding that since the colleges had equal chances of winning the game, the effects they experience from winning or losing can be attributed to the outcome of the game and not found to be preexisting factors.

Anderson's report found that for NCAA Division I Football Bowl Subdivision teams -- teams that compete during the season and are potentially eligible for postseason bowl games -- winning football games increases alumni athletic donations, enhances academic reputation, increases the number of applicants and in-state students, reduces acceptance rates and raises average incoming SAT scores.

He identifies differences in the impact in the six conferences that participate in the Bowl Championship Series -- Atlantic Coast Conference, Big East Conference, Southeastern Conference, Big 10 Conference, Big 12 Conference, and Pacific-12 Conference -- and everyone else. Colleges from these conferences saw larger effects from athletic success than what he calls the "non-BCS" colleges in most of those categories.

Non-BCS colleges experienced a larger effect from athletic success in enrollment of in-state students and average SAT rates. "Both these measures pertain to attracting students rather than satisfying alumni, and it is possible that winning seasons have a larger effect on visibility for lower-profile non-BCS schools than for high-profile BCS schools," according to the report.



Anderson said previous research findings have been split about whether athletic success has any effect on these aspects of institutional development: "I think the previous research had been pretty mixed," he said. And even though his findings reveal effects that are up to three times greater than those in previous studies, he said these "spillover benefits" are still not enough to justify athletics expenditures.

According to the report, if a college improves its season wins by 5 games, it can expect alumni athletic donations to increase by \$682,000 (28 percent), applications to increase by 677 (5 percent), in-state enrollment to increase by 76 students (3 percent) and incoming students' 25th-percentile SAT scores to increase by nine points (1 percent). But Anderson said these positive effects would not recoup however much money a college invested in its athletics program.

Jason Lanter, an assistant professor of psychology at Kutztown University and past president of the Drake Group, a faculty organization that has urged greater scrutiny of big-time athletics in higher education, said colleges need to

look at the report with a grain of salt and realize that athletic success has a minimal impact on academics.

He said he is concerned about how an investment to boost athletic success would impact opportunities for students. "We need to think about the impact that this has on an institution as an educational system," he said. "If our mission is to educate young people, help them prepare for after college, then what does athletics do to help benefit that after college component?"

He and Anderson both said that since a lot of Football Bowl Subdivision teams still lose money, the positive effects outlined in this report aren't enough to justify additional spending.

EXHIBIT No.

16

USC

Student-Athlete Handbook

2019-2020

Mission Statement

Specifically, the goals for USC Athletics are: to graduate every student-athlete who completes athletic eligibility at USC; *to compete successfully in every sport, striving to be in the top 10 nationally, with the ultimate goal of winning national championships*; to provide an environment conducive to positive growth and development of student-athletes and Athletics Department staff; to encourage a real, complete and robust college experience, not just an athletic experience; *to provide adequate financial support within the department to ensure continuing development of each sport program without university subsidization*; and to do all the above while complying fully with all NCAA and Pac-12 regulations.

EXHIBIT No.

17

Updating the AD searches at USC and UCLA: Financial factors, including Pac-12 revenue woes, impact the process

Some A-list candidates wonder if the resources create the best chance for success

By **ION WILNER** | iwilner@bayareanewsgroup.com | Bay Area News Group
PUBLISHED: October 31, 2019 at 9:33 am | UPDATED: October 31, 2019 at 9:38 am
UCLA is looking for its fifth athletic director in the past half century.

USC is looking for its fourth AD this decade.

Vital to the schools, crucial for the conference and closely watched across the country, the searches are unfolding in the nation's largest media market with major college football.

The searches are concurrent, but not in lockstep.

The Trojans are further along after jettisoning Lynn Swann in September and facing a time crunch created by the recruiting calendar and likelihood of Clay Helton's dismissal.

Ideally, a new athletic director will be in place by the end of November to hire the new coach (Urban Meyer) as quickly as possible (Urban Meyer) because of the early-signing period (Urban Meyer).

The Bruins are just starting the process of replacing Dan Guerrero, who's on the job until the spring.

They need a search firm and a timeline and guidance from chancellor Gene Block, who is expected to retire in 2020 or 2021.

Would Block hire a new athletic director and walk away six months later? Or might he appoint an interim and allow his successor to find a permanent replacement?

(We're assuming the former but not discounting the possibility of a long-term interim.)

In each case, numbers are key ...

***** \$31.3 million:** The Pac-12 distributions to each campus in FY18.

According to multiple industry sources, top-tier candidates are concerned that Pac-12 conference finances could lower the ceiling for each position.

Sources stressed that the Pac-12's lagging revenue is not a deal-breaker but, rather, one of several factors being considered — especially with regard to the Trojans' search.

USC's constituents expect to compete for the national championship with the powerhouses in the Big Ten, SEC and Big 12. But A-list candidates wonder if the resources are available to make that goal attainable:

USC's revenue in FY18 was \$117 million, according to the OC Register. The top-tier programs in the SEC and Big Ten all generate well in excess of \$150 million.

The disparity is due to a variety of factors, including the Pac-12 payouts and USC's colossally undervalued apparel deal with Nike. (And there are others.)

Established athletic directors at football schools evaluate USC's budget and conference revenue against expectations and, per sources, are hesitant to leave their current positions for a job with fewer resources.

***** \$1.08 million:** Guerrero's reported salary in FY18

The longest-tenured AD in the conference is also the highest-paid, at least among his peers at public schools.

The Bruins aren't expected to offer more money to his replacement, according to a UCLA source, who added that the likely targeted salary range will be \$750,000 to \$900,000.

And that's in Los Angeles.

Lop off 33 percent to account for the cost of living in the Westwood/Brentwood area — remember, athletic directors need homes large enough to entertain donors — and the Bruins would be offering \$500,000 or \$600,000 to sitting ADs elsewhere.

That's not enough to lure a veteran from a Power Five school.

Unless the Bruins are willing to break with their established approach to salaries, the pool of candidates will be limited to ADs at Group of Five schools — there are some quality options at the level, for sure — or deputy ADs within the Power Five.

\$2.0 million: USC's starting point

Multiple industry sources told the Hotline that the Trojans are willing to offer top-end compensation to the best candidates.

And that the school could go higher if needed.

At \$2+ million annually, USC would have everyone's attention save for Notre Dame's Jack Swarbrick, who reportedly earns more than \$3 million in total compensation.

Many of the top names in the industry — Clemson's Dan Radakovich, Oklahoma's Joe Castiglione, Ohio State's Gene Smith, Alabama's Greg Byrne, Texas' Chris Del Conte and Northwestern's Jim Phillips, just to name six — are in the \$1 to \$1.5 million range.

An offer above \$2 million would offset the cost-of-living increase.

But many qualified candidates who have strong alignment with their president/chancellor are wary of USC's resources (as mentioned above) or simply aren't interested in the lifestyle.

No salary could lure them — and their spouse and kids — to Los Angeles.

Related Articles

- **Dear USC president Carol Folt: A (very real made-up) letter from Pac-12 constituents**
 - **UCLA needs an AD: The candidate pool and search dynamics**
 - **The future of the Pac-12: How market forces (but not those market forces) could reshape the conference**
 - **Pac-12 football coaching salaries are ridiculously low: Time for the presidents to pay up (or give up)**
- Each search is self-selecting, albeit in different manners.

USC's candidate pool is larger because of the salary and the football tradition and the lack of public school bureaucracy.

(Auburn's Allen Greene is a name to watch, according to several industry sources, and would be a smart hire.)

But the Trojans must stay out of their own way to get this right.

In the face of rejection by A-listers, they must ignore the instinct to close ranks, revert to past practice and hire one of their own.

The Bruins are blessed with more time, and they need it.

EXHIBIT No.

18

Historic Campaign for USC Comes to a Close Historic Campaign for USC Comes to a Close

USC's fundraising effort reshapes the university, boosting student scholarships, research, academics and more.



by Alicia Di Rado

Spring 2019



Bovard Administration

Building stands at the heart of the USC University Park Campus. (USC Photo/Michael Owen Baker)

THE GOALS OF the historic Campaign for USC went far beyond the funds the effort raised. The campaign aimed to improve the quality of USC's education. It boosted scholarships for students. USC's influential research and outreach accelerated. The campaign also supported contributions to the arts, humanities, sciences and professional disciplines. And it created a stronger university for future generations.

The more than 400,000 donors who stepped forward to support the Campaign for USC since its public launch in 2011 made that happen.



The Campaign for USC supports outreach to the community. (Photo/Courtesy of Shaliz Aflatooni)

By the time the campaign ended on Dec. 31, 2018, trustees, alumni, parents and friends provided more than \$7 billion for vital projects across USC. The campaign was the second largest fundraising effort in the history of U.S. higher education. From modern research labs to new spaces for students to live and learn, the campaign has made a tangible difference for Trojans. Here are a few examples of its lasting contributions. *(Story continues below.)*

University leaders gave credit to alumni, faculty, staff and other members of the Trojan Family who gave gifts of all sizes before the Campaign for USC ended. The campaign reached its goal of \$6 billion about 18 months early.

In a letter of gratitude to the community, interim President Wanda Austin and USC Board of Trustees Chair Rick Caruso wrote, "Thanks to you, more USC students benefit from scholarships, more faculty members have resources to support bold ideas, more patients have access to outstanding healthcare and more of our neighbors thrive as a result of our community-engagement efforts."

EXHIBIT No.

19

Open Women

[Official Site](#) | [Roster](#) | [Schedule](#)



[2020](#) | [2019](#) | [2018](#) | **2017** | [2016](#) | [2015](#) | [2014](#) | [2013](#)

Head Coach - Zenon Babraj, 14th year

2016 Finish

- Team - 14th at NCAAs
- Varsity 8 - 3rd at Pac-12s, 10th at NCAAs
- 2nd Varsity 8 - 7th at Pac-12s, 18th at NCAAs
- Varsity 4 - 4th at Pac-12s, 17th at NCAAs

[2020](#) | [2019](#) | **2018** | [2017](#) | [2016](#) | [2015](#) | [2014](#) | [2013](#)

Head Coach - Joshua Adam, 1st year

2017 Finish

- Team - 5th at Pac-12s
- Varsity 8 - 5th at Pac-12s
- 2nd Varsity 8 - 7th at Pac-12s
- Varsity 4 - 3rd at Pac-12s

[2020](#) | **2019** | [2018](#) | [2017](#) | [2016](#) | [2015](#) | [2014](#) | [2013](#)

Head Coach - Joshua Adam, 2nd year

2018 Finish

- Team - 4th at Pac-12s, 12th at NCAAs
- Varsity 8 - 4th at Pac-12s, 8th at NCAAs
- 2nd Varsity 8 - 4th at Pac-12s, 15th at NCAAs
- Varsity 4 - 7th at Pac-12s, 17th at NCAAs

EXHIBIT No.

20

2017-18 USC Women's Rowing Schedule

- [Print](#)

-

- Choose A Location:
- Season:

Scheduled Games



OCT 28 (SAT) ALL DAY

HEAD OF THE AMERICAN

SACRAMENTO, CA

- [RECAP](#)

[Hide/Show Additional Information For Head of the American - October 28, 2017](#)



NOV 12 (SUN) ALL DAY

SAN DIEGO FALL CLASSIC

SAN DIEGO, CA

- [RECAP](#)

[Hide/Show Additional Information For San Diego Fall Classic - November 12, 2017](#)



MAR 3 (SAT) 9:30 AM PT

WASHINGTON

HENDERSON, NV

o RECAP

Hide/Show Additional Information For Washington - March 3, 2018



MAR 24 (SAT) MAR 25 (SUN) ALL DAY

SAN DIEGO CREW CLASSIC

SAN DIEGO, CA

o RECAP

Hide/Show Additional Information For San Diego Crew Classic - March 24, 2018



MAR 31 (SAT) APR 1 (SUN) ALL DAY

PAC-12 CHALLENGE

REDWOOD SHORES, CA

o RECAP

Hide/Show Additional Information For Pac-12 Challenge - March 31, 2018



APR 14 (SAT) APR 15 (SUN) ALL DAY

CLEMSON INVITATIONAL

CLEMSON, SC

o RECAP

Hide/Show Additional Information For Clemson Invitational - April 14, 2018



APR 28 (SAT) 9:00 AM PT



SAN PEDRO, CA

o RECAP

o PHOTOS

Hide/Show Additional Information For UCLA - April 28, 2018



MAY 13 (SUN) ALL DAY

PAC-12 CHAMPIONSHIPS

SACRAMENTO, CA

- RECAP

Hide/Show Additional Information For Pac-12 Championships - May 13, 2018

- **NCAA CHAMPIONSHIPS**



-

MAY 25 (FRI) 5:00 AM PT

47 NCAA ROWING CHAMPIONSHIPS

SARASOTA, FL

- PREVIEW

- HEAT & LANE ASSIGNMENTS

Hide/Show Additional Information For NCAA Rowing Championships - May 25, 2018



-

MAY 26 (SAT) 5:00 AM PT

47 NCAA ROWING CHAMPIONSHIPS

SARASOTA, FL

- PREVIEW

Hide/Show Additional Information For NCAA Rowing Championships - May 26, 2018



-

MAY 26 (SAT) 11:00 AM PT

A7 NCAA ROWING CHAMPIONSHIPS

SARASOTA, FL

EXHIBIT No.

21

Since the news of the Department of Justice investigation broke last week, I know there have been a number of questions and significant speculation concerning the involvement of UCLA Athletics. An internal review is underway, and while it would be premature to address specifics of the matter at this time, I do want to provide clarity where I can.

First and foremost, I understand and share the outrage that this news has sparked. The behavior described in the allegations is disturbing and unacceptable. As an athletic department, we pride ourselves on conducting our business with the utmost integrity. As I have said throughout my career, how we do things is just as important as the results we produce. Representing this university with character and integrity is paramount, not just for me, but for every coach, staff member and student-athlete.

We have received many questions about the student-athlete admissions process at UCLA, so let me explain how the process works.

All prospective scholarship and recruited non-scholarship student-athletes are vetted via a multi-step evaluation process. This process includes an evaluation of athletic ability, and academic preparation and engagement. Coaches submit a list of candidates for admissions consideration in their respective sports to athletic administration officials, who then review the candidates. Inherent in the process is a level of trust that the administration places in the coaches and their evaluations of the abilities and talent levels of prospective student-athletes. Athletic administration officials then present the candidates to the University's Student-Athlete Admissions Committee (the "SAAC"). The SAAC is comprised of eight individuals, including admissions administrators and faculty members from varying disciplines across campus. Athletic administration officials present candidates, but do not have a vote in admission decisions.

Prospective student-athletes will be admitted only if, in the judgment of the SAAC, the prospective student-athlete can succeed academically and graduate from UCLA. Prospective student-athletes must be certified as NCAA-eligible in order to be approved for student-athlete admission. No prospective student-athlete will be offered admission, or be given any verbal indication of likely admission, prior to review and admission approval by the SAAC. Equally, National Letters of Intent or Grant-in-Aid contracts will not be offered to prospects until admission approval is granted by the SAAC.

We believe that our process is among the most demanding and thorough in collegiate athletics but, as the recent news illustrates, it is not foolproof. Despite the fact that we have confidence in the existing process, a breach of the system can obviously occur when individuals choose to act unethically, and contrary to the level of integrity that we expect. In collaboration with the University, we are currently reviewing every aspect of the student-athlete admissions process. We will use this opportunity to identify areas that can be strengthened, and we will take the appropriate steps to do so. Once those steps are identified, we will share them openly.

UCLA Athletics takes pride in what it means to be a Bruin, and we owe it to all students to ensure that fairness and integrity in the admissions process is maintained.

EXHIBIT No.

22

Dear _____

Thank you for your recent application for admission to the University of Southern California. In order for your application to be reviewed, we need you to complete one more item.

The following affirmations are required application elements and must be completed for any subsequent admission to be valid. If the affirmation is completed by someone other than the applicant, it is not considered valid and any admission offer may be rescinded.

Please view the affirmation below and click the button below to log into your portal to complete the applicant affirmation. Please note: The date you submitted your Common Application is considered as your submission date, not the date you submit the affirmation form.

I certify that I am personally responsible for what is submitted in my USC application. All information supplied on application forms and contained in related materials is accurate, complete, and my own work. I also acknowledge that USC may audit my application at any point in the enrollment process and that specific information will be verified for authenticity, accuracy, authorship, and completeness.

Further, I understand that while conducting such an audit, USC reserves the right to gather and verify information with officials from my high school(s) or college(s), authors of my recommendation letters, individuals associated with my extracurricular or employment activities, and information available online, through social media and other sources.

All USC admission offers are conditional and may be rescinded

Only a letter from the USC Office of Admission grants official admission to the university. All such offers are conditional, and any of the following circumstances, even if discovered after your matriculation to USC, may result in rescission of an offer of admission, expulsion from the university or other disciplinary action:

- There was false or misleading information provided in the admission process.
-
- You did not graduate high school.

- Your post-admission academic performance shows a significant down-turn and/or your curriculum changes (e.g. you withdraw from a specific class or classes).
-
- You engage in behavior prior to your USC matriculation that demonstrates a lack of maturity, judgment or integrity, and/or violates USC's Code of Ethics and/or Principles of Community statement.
-

Sincerely,

Kirk Brennan
Associate Dean
Director of Undergraduate Admission
University of Southern California